

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	Criminal No.	21cr10059
	)		
v.	)	Violations:	
	)		
PATRICK PLUMMER,	)	<u>Count One:</u> Attempted Enticement of a Minor	
	)	(18 U.S.C. § 2422(b))	
	)		
Defendant	)	<u>Count Two:</u> Travel with Intent to Engage in Illicit	
	)	Sexual Conduct	
	)	(18 U.S.C. § 2423(b))	
	)		
	)	<u>Count Three:</u> Transportation of Child Pornography	
	)	(18 U.S.C. § 2252A(a)(1))	
	)		
	)	<u>Child Pornography/Child Exploitation Forfeiture</u>	
	)	<u>Allegation:</u>	
	)	(18 U.S.C. § 2253)	
	)		
	)	<u>Transportation Forfeiture Allegation:</u>	
	)	(18 U.S.C. § 2428(a) and 28 U.S.C. § 2461(c))	

INDICTMENT

COUNT ONE

Attempted Enticement of a Minor  
(18 U.S.C. § 2422(b))

The Grand Jury charges:

From on or about September 10, 2020 through on or about September 26, 2020, in the District of Massachusetts and elsewhere, the defendant,

PATRICK PLUMMER,

using any facility and means of interstate and foreign commerce, knowingly attempted to persuade, induce, entice, and coerce an individual who had not attained the age of eighteen years to engage in any sexual activity for which any person can be charged with a criminal offense, to wit: Mass. Gen. Laws chapter 265, section 23.

All in violation of Title 18, United States Code, Section 2422(b).

COUNT TWO

Travel with Intent to Engage in Illicit Sexual Conduct  
(18 U.S.C. § 2423(b))

The Grand Jury further charges:

On or about September 26, 2020, in the District of Massachusetts and elsewhere, the defendant,

PATRICK PLUMMER,

traveled in interstate commerce with a motivating purpose of engaging in any illicit sexual conduct with another person, as defined in Title 18, United States Code, Section 2423(f)(1).

All in violation of Title 18, United States Code, Section 2423(b).

COUNT THREE  
Transportation of Child Pornography  
(18 U.S.C. § 2252A(a)(1))

The Grand Jury further charges:

On or about September 26, 2020, in the District of Massachusetts and elsewhere, the defendant,

PATRICK PLUMMER,

knowingly transported any child pornography, as defined in Title 18, United States Code, Section 2256(8), using any means and facility of interstate commerce and in and affecting interstate commerce.

All in violation of Title 18, United States Code, Section 2252A(a)(1).

CHILD PORNOGRAPHY/CHILD EXPLOITATION FORFEITURE ALLEGATION  
(18 U.S.C. § 2253)

The Grand Jury further finds that:

1. Upon conviction of one or more of the offenses in violation of Title 18, United States Code, Section 2252A, set forth in Count Three, the defendant,

PATRICK PLUMMER,

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 2253, (i) any visual depiction described in sections 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110 of Title 18, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Chapter 110 of Title 18; (ii) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and (iii) any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses or any property traceable to such property. The property to be forfeited includes, but is not limited to, the following:

- a. one black Apple iPhone 11 Pro Max in a silver case, bearing serial number G6TZMF33N70C;
- b. one black Apple iPhone 5, bearing serial number DX4SD0BZFF9Y;
- c. one black Apple iPhone 5, bearing serial number DX3PT8GSFF9R;
- d. one black Apple iPhone X, bearing serial number GHLYQ0U3JCLF; and
- e. one red Dell Inspiron 11, 3000 series laptop computer.

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 2253, as a result of any act or omission of the defendant—

- a. cannot be located upon the exercise of due diligence;

- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States of America, pursuant to Title 18, United States Code, Section 2253(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 2253.

TRANSPORTATION FOR ILLICIT SEXUAL CONDUCT FORFEITURE ALLEGATION  
(18 U.S.C. § 2428(a) and 28 U.S.C. § 2461(c))

1. Upon conviction of the offense in violation of Title 18, United States Code, Section 2423, set forth in Counts One and Two, the defendant,

PATRICK PLUMMER,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2428(a), and Title 28, United States Code, Section 2461(c): (1) the defendant's interest in any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such offense; and (2) any property, real or personal, which constitutes or is derived from any proceeds the defendant obtained, directly or indirectly, as a result of such offense.

2. If any of the property described in paragraph 1, above, as being forfeitable, as a result of any act or omission of the defendant –

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of this Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

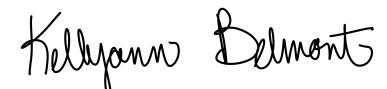
All pursuant to Title 18, United States Code, Section 2428(a) and Title 28, United States Code, Section 2461(c).

A TRUE BILL

  
FOREPERSON

  
\_\_\_\_\_  
J. MACKENZIE DUANE  
ASSISTANT UNITED STATES ATTORNEY  
DISTRICT OF MASSACHUSETTS

District of Massachusetts: FEBRUARY 18, 2021  
Returned into the District Court by the Grand Jurors and filed.

  
\_\_\_\_\_  
DEPUTY CLERK  
2/18/2021 @ 10:56am